

Chemical Requirements Flowdown

or

How I Learned to Love the Regs

Are Requirements Dependent Upon the Contract?

- DOE Order 440.1 series
- DOE Order 5480 series

Mandated Regulations

- 29 CFR 1910
- 29 CFR 1926
- NFPA

29 CFR1910.6

Lists requirements invoked by OSHA

- ANSI
- CGA

Local Laws

- Uniform Building Code
- Uniform Fire Code

Required for all leased federal facilities

Does one want one set of rules for leased facilities and another for federal facilities?

Additional Requirements

- 49 CFR
Transportation
- 40 CFR
Environmental
- 41 CFR
Property Management

Are Requirements Based Upon the Contract?

Variations are not that significant

Requirements Flowdown

- Requirements come from many sources
 - DOE orders, OSHA, NFPA, ANSI, CGA...
- Multiple requirements cover same topic
 - Overlap, repetition, contradictions
- Large number of requirements

Requirements Flowdown (cont')

- Consolidation difficult
- Tracking of requirements required

Needed to ensure complete coverage of requirements
as required by ISMS

How Well Are We Doing?

- Tested using worker requirements for compressed gases
 - Developed a consolidated listing of regs
 - Sent listing to 4 different DOE sites
 - Compared the list to that present at each site

Results

Results vary widely.

- Site A: 64%
- Site B: 38%
- Site C: 100%
- Site D: 72%

Results (cont')

- Substantially below 100% as required by ISMS
- Indicate that most sites need help in flowing requirements down

Proposed solution

Develop a consolidated listing of chemical safety/management requirements

- Publish on the internet for easy access
- Provide an organized listing
- Developed by a team from various DOE sites
- Provide guidance on minimum requirements

Proposed Solution (cont')

Has many advantages

- Provide consistent direction
- Saves each user the cost of developing own
- develops a network of experts across the complex